

ALLEN & OVERY

VIA ECF

Hon. Victoria Reznik
United States Magistrate Judge
Southern District of New York
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White Plains, NY 10601

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March 29, 2024

RE: *The Wave Studio, LLC v. General Hotel Management Ltd. et al.,*
Case No. 7-13-cv-09230-CS-VR

Dear Judge Reznik:

We are new counsel for Qatar Airways Group Q.C.S.C. in this action. We write pursuant to the Court's March 12, 2024 Order (Dkt. 354) directing Defendants to disclose their insurance information (including reservation of rights letters) to Plaintiff no later than March 29, 2024.

Qatar Airways and undersigned counsel have worked diligently to determine if there is any insurance coverage for Plaintiff's claims. **To date, our investigation suggests that there is no applicable insurance.** However, Qatar Airways is continuing its investigation to confirm this.

Qatar Airways' investigation into applicable insurance coverage has been complicated by (1) the length of time elapsed since the case was initiated and the period of the alleged infringement (2012-2014), (2) changes in its litigation counsel (prior counsel having passed away in late 2023) and dissolution of that firm, (3) changes in its in-house personnel, and (4) the need to consult third parties (including the persons in charge of winding up prior counsel's firm, and third-party insurance brokers) to obtain information about potentially applicable insurance coverages.

Accordingly, Qatar Airways respectfully requests that it be permitted to submit another letter with a status update by no later than April 19, 2024, as was done for Defendant British Airways (Dkt. 359), in order to complete and confirm its investigation.

Qatar Airways also respectfully reiterates and reserves its objections based on personal jurisdiction.

Sincerely,



Sapna Palla

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